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November 27, 2020

VIA ECF

The Hon. Sanket J. Bulsara, U.S.M.J.
Theodore Roosevelt U.S. Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Vladov et al. v. Nabiullina, No. 20-cv-4633-RRM-SJB

Dear Judge Bulsara,

My office represents Defendant Julia Nabiullina in the above-captioned matter. I write on behalf of Defendant, pursuant to Fed.R.Civ.P. 6(b), Local Civil Rule 7.1(d), and Your Honor's Individual Practices, to request an extension of time for Defendant to respond to the complaint. This is the first request for an extension of time in this matter.

Defendant requests a 70-day extension from the date of service, which was November 6, 2020. The current due date for the response is November 27, 2020, and the requested new date is January 15, 2021.

The reason for this request is that the undersigned counsel was engaged by Defendant to represent her in this case on November 19, 2020, and has not had sufficient opportunity to review the facts of this matter and prepare an appropriate response in compliance with my professional obligations to my client and to the Court. Plaintiffs' complaint includes numerous allegations that require the undersigned counsel's detailed investigation of relevant facts and review of potentially many relevant documents to prepare appropriate response. In view of the upcoming holiday season, Defendant requests the aforesaid extension.

On November 20, 2020, Defendant's undersigned counsel contacted Plaintiffs' counsel, Gregory Gorodetsky, to request a 60-day extension to respond to Plaintiffs' complaint. After some ensuing discussions that continued through today, Defendant has been unable to obtain Plaintiffs' consent to her said request for an extension.

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Accordingly, Defendant Julia Nabiullina respectfully requests that the Court issue an order approving the requested extension for responding to Plaintiffs' complaint in this case from today's date, November 27, 2020, until January 15, 2021.

We thank the Court for its consideration of this request.

Respectfully,

/s/ Timur Zubaydullin
Timur Zubaydullin, Esq.

CC: All counsel (via ECF)